Mr. Dixon Churchill
Toyota Industrial Equipment Manufacturing, Inc.
5555 Inwood Drive
P.O. Box 2487
Columbus, IN 47202-2487

Re: **005-10989**
First Administrative Amendment to
Part 70 005-7545-00040

Dear Mr. Churchill:

Toyota Industrial Equipment Manufacturing, Inc. was issued a permit on April 14, 1999, for a stationary industrial truck manufacturing source. A letter requesting a change was received on May 21, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Two (2) existing robotic welding units which previously exhausted inside the building now exhaust to the exterior of the building. The two (2) welding units were included in Section A.3 of the Part 70 Operating Permit as two (2) of the ninety-nine (99) metal inert gas (MIG) welding stations (Section A.3(e)(3)). There are no changes to the permit as a result of this change.

Seven (7) additional metal inert gas (MIG) welding stations have been added to the source and will be utilized in a new process (B300). These welding units are insignificant activities. The welding units will be subject to 326 IAC 6-3-2(c), and will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The one (1) steel shotblast unit, designated as NEWSB, will now be identified as U011. The new mast powder coat line, consisting of the two (2) powder coating booths and insignificant combustion units will now be identified as I012.

As a result of these changes, Sections A.2 and A.3 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 12 trucks per hour.

(b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-

assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 12 trucks per hour.

(c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as over-spray control, exhausting to stacks S003a and S003b, capacity: 12 units per hour.

(d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 12 trucks per hour.

(e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 3 trucks per hour.

(f) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a baghouse (C010) and exiting into the building, capacity: 132,000 pounds of steel shot per hour.

(g) One (1) small parts shot blast cabinet, identified as U010, constructed in 1992, exhausting to a baghouse (C009) and exiting into the building, capacity: 60,000 pounds of shot per hour.

(h) One (1) steel shot blast unit, with a maximum blast rate of 115,500 pounds per hour, controlled by a dust collector, designated as **U011** ~~NEWSB~~, and exhausts inside the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Forty-three (43) emission units with a total heat input capacity of 29.33 million British thermal units per hour. Includes, two (2) boilers rated at 0.75 million British thermal units per hour.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Two (2) parts cleaners, using non-VOC materials, with capacities of 60 and 80 gallons, and one (1) maintenance parts cleaner, using mineral spirits, with a capacity of 16 gallons.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(e) Other activities or categories with emissions equal to or less than the insignificant activity thresholds:

(1) One (1) counter-weight sanding booth, identified as I003, controlled by a dry filter, and exhausting to stack S003c.

(2) One (1) powder coat line, identified as I011, controlled by a primary and secondary filter and exhausting to the building.

(3) Ninety-nine (99) metal inert gas (MIG) welding stations.

(4) Two (2) powder coating booths, **identified as I012,** with a maximum raw material usage rate of 4861 gallons per year, one line consists of a powder reclamation process, both lines are controlled voluntarily by a two (2) stage filtration system consisting of HEPA filters in series and the filters exhaust to the atmosphere.

(5) Seven (7) metal inert gas (MIG) welding stations in process B300.

The capacities of the emission units described in Section A.2 (a) through (e) are correct. However, the facility descriptions in Section D.1 of the Part 70 Operating Permit are incorrect. The facility descriptions in Section D.1 have been revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 7 **12** trucks per hour.

(b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: ~~7~~ **12** trucks per hour.

(c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: ~~7~~ **12 units** ~~trucks~~ per hour.

(d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: ~~7~~ **12** trucks per hour.

(e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: ~~1.5~~ **3** trucks per hour.

As a result of the changes to Sections A.2 and A.3, the facility descriptions of Sections D.3 and D.4 are revised as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities

Facility Description [326 IAC 2-7-5(15)]

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Forty-three (43) emission units with a total heat input capacity of 29.33 million British thermal units per hour. Includes, two (2) boilers rated at 0.75 million British thermal units per hour.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Two (2) parts cleaners, using non-VOC materials, with capacities of 60 and 80 gallons, and one (1) maintenance parts cleaner, using mineral spirits, with a capacity of 16 gallons.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(e) Other activities or categories with emissions equal to or less than the insignificant activity thresholds:

(1) One (1) counter-weight sanding booth, identified as I003, controlled by a dry filter, and exhausting to stack S003c.

(2) One (1) powder coat line, identified as I011, controlled by a primary and secondary filter and exhausting to the building.

(3) Ninety-nine (99) metal inert gas (MIG) welding stations.

(4) Two (2) powder coating booths, **identified as I012,** with a maximum raw material usage rate of 4861 gallons per year, one line consists of a powder reclamation process, both lines are controlled voluntarily by a two (2) stage filtration system consisting of HEPA filters in series and the filters exhaust to the atmosphere.

(5) Seven (7) metal inert gas (MIG) welding stations in process B300.

SECTION D.4 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(h) One (1) steel shot blast unit, with a maximum blast rate of 115, 500 pounds per hour, controlled by a dust collector, designated as **U011** ~~NEWSB~~, and exhausts inside the building.

There are no changes to the conditions of the Part 70 Operating Permit as a result of these amendments. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Ortolani, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
CAO/MES
cc: File - Bartholomew County
U.S. EPA, Region V
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Toyota Industrial Equipment Manufacturing, Inc.
5555 Inwood Drive
Columbus, Indiana 47202

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 005-7545-00040	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

First Administrative Amendment: 005-10989-00040	Pages Affected: 6, 7, 32, 39 and 42
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary industrial truck manufacturing source.

Responsible Official:	R.J. Reynolds
Source Address:	5555 Inwood Drive, Columbus, Indiana 47202
Mailing Address:	5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487
SIC Code:	3537
County Location:	Bartholomew
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 12 trucks per hour.

(b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 12 trucks per hour.

(c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 12 units per hour.

(d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 12 trucks per hour.

(e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 3 trucks per hour.

(f) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a baghouse (C010) and exiting into the building, capacity: 132,000 pounds of steel shot per hour.

(g) One (1) small parts shot blast cabinet, identified as U010, constructed in 1992, exhausting to a baghouse (C009) and exiting into the building, capacity: 60,000 pounds of shot per hour.

(h) One (1) steel shot blast unit, with a maximum blast rate of 115,500 pounds per hour, controlled by a dust collector, designated as U011, and exhausts inside the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Forty-three (43) emission units with a total heat input capacity of 29.33 million British thermal units per hour. Includes, two (2) boilers rated at 0.75 million British thermal units per hour.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Two (2) parts cleaners, using non-VOC materials, with capacities of 60 and 80 gallons, and one (1) maintenance parts cleaner, using mineral spirits, with a capacity of 16 gallons.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(e) Other activities or categories with emissions equal to or less than the insignificant activity thresholds:

(1) One (1) counter-weight sanding booth, identified as I003, controlled by a dry filter, and exhausting to stack S003c.

(2) One (1) powder coat line, identified as I011, controlled by a primary and secondary filter and exhausting to the building.

(3) Ninety-nine (99) metal inert gas (MIG) welding stations.

(4) Two (2) powder coating booths, identified as I012, with a maximum raw material usage rate of 4861 gallons per year, one line consists of a powder reclamation process, both lines are controlled voluntarily by a two (2) stage filtration system consisting of HEPA filters in series and the filters exhaust to the atmosphere.

(5) Seven (7) metal inert gas (MIG) welding stations in process B300.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 12 trucks per hour.

(b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-assisted airless spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 12 trucks per hour.

(c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 12 units per hour.

(d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 12 trucks per hour.

(e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 3 trucks per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the fork lift trucks and all metal parts and surfaces shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

These facilities shall use no more than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months, based on a twelve (12) month rolling total. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to PC (03) 1733, issued on March 3, 1989, the primer coat paint booth, top coat paint booth, and touch-up paint booth are subject to the requirements of 326 IAC 6-3-2(c). Pursuant to CP 005-2724-00057, issued on May 26, 1993, the counter-weight paint booth is subject to the requirements of 326 IAC 6-3-2(c). Pursuant to CP 005-5827-00040, issued on August 19, 1996, the D-500 paint

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities

Facility Description [326 IAC 2-7-5(15)]

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Forty-three (43) emission units with a total heat input capacity of 29.33 million British thermal units per hour. Includes, two (2) boilers rated at 0.75 million British thermal units per hour.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Two (2) parts cleaners, using non-VOC materials, with capacities of 60 and 80 gallons, and one (1) maintenance parts cleaner, using mineral spirits, with a capacity of 16 gallons.

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(e) Other activities or categories with emissions equal to or less than the insignificant activity thresholds:

(1) One (1) counter-weight sanding booth, identified as I003, controlled by a dry filter, and exhausting to stack S003c.

(2) One (1) powder coat line, identified as I011, controlled by a primary and secondary filter and exhausting to the building.

(3) Ninety-nine (99) metal inert gas (MIG) welding stations.

(4) Two (2) powder coating booths, identified as I012, with a maximum raw material usage rate of 4861 gallons per year, one line consists of a powder reclamation process, both lines are controlled voluntarily by a two (2) stage filtration system consisting of HEPA filters in series and the filters exhaust to the atmosphere.

(5) Seven (7) metal inert gas (MIG) welding stations in process B300.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to PC (03) 1733, issued on March 3, 1989, the one (1) maintenance parts washer using mineral spirits with a capacity of sixteen (16) gallons is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations). Pursuant to this rule, the owner or operator of the one (1) parts washer shall:

(a) Equip the cleaner with a cover;

SECTION D.4 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(h) One (1) steel shot blast unit, with a maximum blast rate of 115, 500 pounds per hour, controlled by a dust collector, designated as U011, and exhausts inside the building.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP005-10284-00040 and 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blast unit shall not exceed 45.9 pounds per hour when operating at a process weight rate of 115,500 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements

D.4.4 Particulate Matter (PM)

Pursuant to CP005-10284-00040, the dust collector for PM control shall be in operation at all times when the shot blast unit is in operation.

D.4.5 Visible Emissions Notations

(a) Daily visible emission notations of the shot blast unit at the point of exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.